

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

14-cv-9126-ALC

v.

ANTHONY THOMPSON, ET AL.,

Defendants,

**DECLARATION OF MAUREEN PEYTON KING IN FURTHER SUPPORT
OF PLAINTIFF'S APPLICATION FOR AN ORDER TO SHOW CAUSE
WHY DEFENDANT ANTHONY THOMPSON SHOULD NOT
BE HELD IN CIVIL CONTEMPT**

I, Maureen Peyton King, pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am a senior trial counsel employed by the Securities and Exchange Commission (the "Commission") in its New York Regional Office. I am a member of the bar of this Court. I am personally familiar with the facts set forth herein.

2. I make this declaration in support of the Commission's application for an order to show cause why Defendant Anthony Thompson ("Thompson") should not be held in civil contempt ("Application").

3. The Final Judgment, Docket Entry 154, imposed on Thompson an obligation to pay within 30 days of entry of the Final Judgment, disgorgement of \$624,882.00, representing profits gained as a result of the conduct alleged in the Complaint, together with prejudgment interest thereon in the amount of \$137,381.00, for a total of \$762,263.00.

4. To date, Thompson has paid only \$5,000 toward the Judgment and only after the Commission filed its Application. The payment was postmarked September 28th. A copy of the payment is attached as Exhibit 1.

5. Thompson had used a web of entities under the umbrella of a trust to hold assets and pay expenses including legal fees. A copy of an excerpted report describing these entities and detailing transfers from these entities to Thompson controlled entities is attached as Ex. 2.

6. Some of the trust's entities used the same address that Thompson's current "employer," Sugarloaf Equities, Inc. uses. Exs. 3-5. Thompson's accounting firm, JF Kearney, also shares this address. Ex. 6.

7. The Commission requested that Thompson produce documents in April 2021. A copy of the request is attached as Ex. 7.

8. Thompson failed to produce missing documents to the Commission after Commission counsel communicated this information to Thompson's counsel. Examples of missing documents were provided to Thompson's counsel on September 23 in an email attached as Ex. 8.

9. When Commission counsel scheduled a call with Thompson's counsel as she requested, she did not dial in or cancel the call. Ex. 9.

10. The Commission has sought deposition dates from Thompson since at least July 2021. A copy of various emails reflecting these requests is attached as Ex. 10.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Wantagh, New York, on October 20, 2021.

s/Maureen Peyton King
Maureen Peyton King